

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK

CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.

Plaintiffs,

vs.

STRAFTS, LLC f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC, et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.

Case No. 1:24-cv-00040-EAW-MJR

**DECLARATION OF ALEXANDER D. WALL IN SUPPORT OF  
RECEIVER'S OPPOSITION TO FIDELIS LEGAL SUPPORT SERVICES, LLC'S  
MOTION CHALLENGING THE RECEIVER'S DETERMINATION  
THAT FIDELIS IS A RECEIVERSHIP DEFENDANT**

I, Alexander D. Wall, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am counsel to Thomas W. McNamara, the Court-appointed receiver ("Receiver"), in the above-captioned action. I have personal knowledge of the facts set forth in this Declaration and if called as a witness, I could and would competently testify to the facts stated herein.

2. I submit this Declaration in connection with the Receiver's Opposition to Fidelis Legal Support Services, LLC's Motion Challenging the Receiver's Determination that Fidelis is a Receivership Defendant.

3. Attached hereto as Exhibit 1 is a true and correct copy of a printout of the front page of the website <https://www.clientfirstbankruptcy.com/>.

4. Attached hereto as Exhibit 2 is a true and correct copy of November 2, 2023 email from Jason Blust with the subject line “Fw: Monarch discovery punch list.”

5. Attached hereto as Exhibit 3 is a true and correct copy of the Consent Order of Discipline in the matter of *The North Carolina State Bar v. Daniel S. Rufty*, North Carolina State Bar No. 20 DHC 17 (Apr. 8, 2021).

6. Attached hereto as Exhibit 4 are true and correct copies of invoices for “Fidelis Legal Support LLC” from October 2021 through June 2022, which were located on StratFS’s servers.

7. Attached hereto as Exhibit 5 is a true and correct copy of a March 16-24, 2022 email thread concerning Fidelis invoices.

8. Attached hereto as Exhibit 6 is a true and correct copy of a November 30, 2021 email thread concerning Fidelis invoices.

9. Attached hereto as Exhibit 7 is a true and correct copy of an October 26-27, 2021 email thread with the subject line “Re: Technology”.

10. Attached hereto as Exhibit 8 is a true and correct copy of the Illinois Secretary of State’s Business Entity Information page for Turnbull Law Group, LLC.

11. Attached hereto as Exhibit 9 is a true and correct copy of the Illinois Secretary of State’s Business Entity Information page for the Law Office of Jason Blust, LLC.

12. Attached hereto as Exhibit 10 is a true and correct copy of the New Jersey Secretary of State’s Business Entity Information page for Turnbull Law Group NJ, LLC.

13. Attached hereto as Exhibit 11 is a true and correct copy of a January 3, 2023 email thread concerning Turnbull Law.

14. Attached hereto as Exhibit 12 is a true and correct copy of a March 16, 2022 email thread concerning invoices for legal services.

15. Attached hereto as Exhibit 13 is a true and correct copy of an expense ledger that was discovered attached to the foregoing March 16, 2022 email thread on StratFS's servers.

16. Attached hereto as Exhibit 14 is a true and correct copy of a Lobbying Services Agreement dated December 2018, which was located on StratFS's servers.

17. Attached hereto as Exhibit 15 is a true and correct copy of the Alaska Secretary of State's Certificate of Registration for Chabner Legal Group LLC.

18. Attached hereto as Exhibit 16 is a true and correct copy of an October 28-29, 2021 email thread initially from Blust's accountants concerning invoices from Arc Strategies, LLC.

19. Attached hereto as Exhibit 17 is a true and correct copy of a May 25-26, 2021 email thread.

Executed this 14th day of March, 2024, in San Diego, California.

/s/ Alexander D. Wall  
Alexander D. Wall